## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

Anas ELHADY, et al.,	) )
Plaintiffs,	) )
v.	) Case No. 1:16-cv-375 (AJT/JFA)
CHARLES H. KABLE, et al.,	)
Defendants.	) ) )

## PROPOSED ORDER ON DEFENDANTS' MOTION FOR A PROTECTIVE ORDER TO LIMIT TOPICS OF RULE 30(B)(6) DEPOSITION

On consideration of the submissions of the parties, the Defendants' Motion for a Protective Order is GRANTED. It is further ORDERED that the deposition will be limited to testimony on the following topics:

- 1. TSC's role in the TSDB nominations process (including generally TSC's understanding of how and why individuals are placed in the TSDB).
- 2. TSC's role in the redress process (excluding the revised redress process for US Persons on the No Fly List).
- 3. TSC's role in terrorism watchlisting in general.
- 4. Measures TSC undertakes to ensure accuracy and reliability of the TSDB.
- 5. Categories of information stored in the TSDB.
- 6. TSC sharing of information from the TSDB with other entities, including TSC's role or responsibility in dissemination and control of such information, the identities of entities that receive exports of TSDB information, and knowledge TSC has about the expected uses of such information.
- 7. Training provided by TSC to persons who work on TSDB nominations, acceptance, rejections, and removals.
- 8. The content of the Overview document (*see* bates numbers Elhady-FBITSC-001947-56), including the standards for inclusion in the TSDB (excluding the No Fly List standards).

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SO ORDERED.  Entered this day of, 2018.	
	U.S. Magistrate Judge John. F. Anderson